

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

INTERNATIONAL UNION, UNITED)	
AUTOMOBILE, AEROSPACE AND)	2:10-cv-11366-AC-MJH
AGRICULTURAL IMPLEMENT)	
WORKERS OF AMERICA,)	
)	
Plaintiff,)	
vs.)	Honorable Avern Cohn
)	Magistrate Judge Michael Hluchaniuk
GENERAL MOTORS LLC,)	
)	
Defendant.)	
)	

NOTICE OF JOINT FILING

Please take Notice, hereby given, that pursuant to Paragraph 1 of the Scheduling Order entered by the Court on October 19, 2011, Plaintiff International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("UAW") and Defendant General Motors LLC ("General Motors" and, together with the UAW, the "Parties") are today jointly filing the list of agreements implicated in this case (attached hereto as Exhibit A), together with copies of the agreements with the relevant portions highlighted.

Neither the listing of any agreement on Exhibit A nor the highlighting of any provision within such agreement is intended to (i) constitute an admission by either Party as to the relevance, materiality or admissibility of such agreement or provision or (ii) preclude the use of, or reference to, agreements or provisions not so listed or highlighted in the litigation.

Dated: November 17, 2011

Respectfully submitted,

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EXHIBIT A

EXHIBIT A

Agreement	Specific Provisions
Settlement Agreement between General Motors Corporation and the UAW, dated December 16, 2005 (the "Henry I Settlement")	Definitions: DC VEBA (<i>p. 3</i>)
	§ 14.A (1st paragraph) (<i>p. 21</i>)
UAW-Delphi-GM Memorandum of Understanding Delphi Restructuring, dated June 22, 2007 (the "2007 MOU")	Section B.1 (<i>p. 2</i>)
	Section J (<i>pp. 20-21</i>)
	Section K.2 (<i>p. 22</i>)
	Attachment A – 3rd bullet point (<i>p. 26</i>)
	Attachment A (site documents for Grand Rapids (<i>p. 27</i>); Rochester (<i>p. 28</i>); Lockport (<i>p. 29</i>), Kokomo (<i>p. 30</i>) and Needmore Road (<i>p. 38</i>))
Global Settlement Agreement Between Delphi Corporation, on behalf of itself and certain of its subsidiaries and Affiliates, and General Motors Corporation, dated September 6, 2007, as amended December 7, 2007 (the "Original GSA")	Recitals (<i>pp. GSA-1 to GSA-4</i>)
	Section 1.112 (<i>p. GSA-15</i>)
	Section 2.01 (<i>pp. GSA-16 to GSA-17</i>)
	Section 2.03(c)(iv) (<i>p. GSA-28</i>)
	Article 3 (Preamble) (<i>p. GSA-30</i>)
	Section 3.02(h) (<i>p. GSA-31</i>)
	Section 4.04(a) (<i>pp. GSA-44 to GSA-45</i>)

Agreement	Specific Provisions
Master Restructuring Agreement Between Delphi Corporation and General Motors Corporation, dated September 6, 2007, as amended December 7, 2007 (the "Original MRA")	Recitals (<i>pp. MRA-1 to MRA-2</i>)
Settlement Agreement by and between General Motors Corporation and the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, dated February 21, 2008 (the "2008 UAW Retiree Settlement Agreement")	Preamble / Recitals (<i>pp. 1-2</i>)
	Definitions: Existing External VEBA (<i>p. 5</i>), New VEBA (<i>p. 8</i>)
	Section 2 (<i>pp. 9-10</i>)
	Section 5.B (<i>p. 12</i>)
	Section 5.C (<i>pp. 12-13</i>)
	Section 8 (<i>pp. 18-20</i>)
	Section 9.A (<i>p. 21</i>)
	Section 11 (<i>p. 22</i>)
	Section 12.C (<i>p. 23</i>)
	Section 14 (<i>p. 26</i>)
	Section 25 (<i>pp. 34-35</i>)
	Section 32.C (<i>p. 40</i>)

Agreement	Specific Provisions
Amended and Restated Global Settlement Agreement Between Delphi Corporation, on behalf of itself and certain of its subsidiaries and Affiliates, and General Motors Corporation, dated September 12, 2008 (the "Amended GSA")	Recitals (<i>pp. GSA-1 to GSA-5</i>)
	Section 1.131 (<i>p. GSA-16</i>)
	Section 2.01 (<i>pp. GSA-18 to GSA-19</i>)
	Article 3 (Preamble) (<i>pp. GSA-33 to GSA-34</i>)
	Section 4.04(a) (<i>p. GSA-47</i>)
	Section 4.04(b) (<i>p. GSA-47</i>)
Amended and Restated Master Restructuring Agreement Between Delphi Corporation and General Motors Corporation, dated September 12, 2008 (the "Amended MRA")	Section 5.04 (<i>p. GSA-48</i>)
	Recitals (<i>pp. MRA-1 to MRA-2</i>)
UAW-Delphi-GM Implementation Agreement Regarding 414(l) Transfers, Implementation of Term Sheet, Delphi Pension Freeze and Cessation of OPEB, and Application of Releases, dated September 26, 2008 (the "2008 Implementation Agreement")	Section 6 (<i>p. 3</i>)
	Last paragraph (<i>p. 4</i>)

Agreement	Specific Provisions
Loan and Security Agreement by and between The Borrower Listed on Appendix A as Borrower and the United States Department of the Treasury as Lender, dated as of December 31, 2008 (the "Treasury Prepetition Loan")	Section 1.01 (<i>p. 20</i>)
	Section 7.20(a) (<i>p. 54</i>)
	Section 7.20(c)(iii) (<i>p. 55</i>)
	Section 7.21 (<i>p. 55</i>)
	Section 7.22 (<i>p. 55</i>)
	Appendix A, Section 1.01 (<i>pp. 4-5</i>)
VEBA Modifications Term Sheet, by and between the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, General Motors Corporation and Class Counsel, dated as of February 17, 2009 (the "VEBA Modifications Term Sheet")	Entire Document
Memorandum of Understanding Delphi Keep Sites between the UAW and General Motors Corporation, dated May 16, 2009 (the "Keep Sites Agreement")	First paragraph and first two sentences of second paragraph (<i>p. 1</i>)

Agreement	Specific Provisions
Master Disposition Agreement Among Delphi Corporation, GM Components Holdings LLC, General Motors Corporation (solely with respect to Article 6 and Sections 9.11.1, 9.19 and 9.38), Parnassus Holdings II, LLC, and The Other Sellers and Other Buyers Party Hereto, dated June 1, 2009 (the "Unimplemented MDA")	Recitals: 3rd Whereas clause (<i>p. 1</i>)
	Definitions: GM Business (<i>p. 10</i>), UAW Sites (<i>p. 23</i>)
	Section 2.1.3 (<i>pp. 25-27</i>)
	Section 2.2.1 (<i>p. 32</i>)
	Section 3.1.1 (<i>pp. 36-37</i>)
	Section 9.2.1 (<i>p. 63</i>)
	Section 9.19.2 (<i>p. 82</i>)
Amended and Restated Master Sale and Purchase Agreement by and Among General Motors Corporation, Saturn LLC, Saturn Distribution Corporation and Chevrolet-Saturn of Harlem, Inc., as Sellers and NGMCO, Inc., as Purchaser, dated as of June 26, 2009 (the "MPA")	Section 9.19.3 (<i>p. 82</i>)
	Definitions: Employees (<i>pp. 6-7</i>), UAW Collective Bargaining Agreement (<i>p. 21</i>)
	Section 2.2(a)(x) (<i>pp. 23; 25</i>)
	Section 6.17(f) (<i>pp. 76-77</i>)
	Section 6.17(g) (<i>p. 77</i>)
	Section 7.2(d) (<i>pp. 87; 90</i>)
	Section 7.2(e) (<i>pp. 87; 90</i>)
	Section 7.3(h) (<i>pp. 91; 93</i>)
	Section 7.3(i) (<i>pp. 91; 93</i>)

Agreement	Specific Provisions
UAW Retiree Settlement Agreement, dated July 10, 2009, between General Motors Company and the UAW (the "2009 UAW Retiree Settlement Agreement")	Preamble / Recitals (pp. 1-2)
	Definitions: Existing External VEBA (p. 5), New VEBA (p. 7)
	Section 2 (pp. 8-9)
	Section 5.B (pp. 10-11)
	Section 5.D (p. 11)
	Section 8 (pp. 13-14)
	Section 12.C (p. 15)
	Section 14 (pp. 17-18)
	Section 25 (pp. 23-24)
	Section 32.C (p. 30)
Master Disposition Agreement Among Delphi Corporation, GM Components Holdings, LLC, General Motors Company (Solely With Respect to Article 6 and Sections 3.1.1.C, 9.11, 9.19, 9.37.1, 9.37.2, 9.43, 11.5.1.A and 12.2.6), Motors Liquidation Company (fka General Motors Corporation) (Solely With Respect to Sections 3.1.1.C, 8.1, 9.19 and 11.5.1.A), DIP Holdco 3, LLC and the Other Sellers and Other Buyers Party Hereto, dated as of July 26, 2009 (the "Approved Delphi Master Disposition Agreement")	Recitals: 3rd Whereas clause (p. 1)
	Definitions: GM Business (p. 13), UAW Sites (p. 26)
	Section 2.1.3 (pp. 27-30)
	Section 2.2.1 (pp. 34-35)
	Section 3.1.1 (p. 39)
	Section 9.19.2 (p. 83)
	Section 9.19.3 (p. 83)

CERTIFICATE OF SERVICE

I hereby certify that, on November 17, 2011, I electronically filed the foregoing with the Clerk of the Court using the ECF system; and I hereby certify that I deposited a copy of the foregoing document in the United States mail, postage prepaid, addressed to any non-ECF participants.

/s/ Robert S. Walker

Robert S. Walker (Ohio Bar No. 0005840)

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